

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
v.	:	CRIMINAL NO. 22-323 (GJP)
MARK HOUCK	:	

GOVERNMENT’S PROPOSED VOIR DIRE QUESTIONS

The United States of America, through its attorneys, Jacqueline C. Romero, United States Attorney, Kristen Clarke, Assistant Attorney General for the Civil Rights Division, submit the following voir dire questions for the Court’s consideration.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

/s/ Sanjay Patel
SANJAY H. PATEL
Trial Attorney
Criminal Section
Civil Rights Division

ANITA EVE
Assistant United States Attorney

1. What is/are your main source(s) of political and national news and information?
2. Have you or has anyone close to you ever had any contact with the U.S. Attorney's Office, Pennsylvania Attorney General's Office, any District Attorney, or other prosecuting office? If yes, please explain.
3. Have you or has anyone close to you worked in law enforcement? If yes, please explain.
4. Have you or has anyone close to you ever worked for an attorney? If yes, please explain.
5. Have you or has any member of your family ever worked for a judge, for a court clerk, or for any court personnel? If yes, please explain.
6. Have you ever served on a jury before?
If yes, how many times?
Were you ever the foreperson of the jury:
What type(s) of jury? (Grand/Civil/Criminal)
If civil trial jury, was the jury able to reach a verdict?
If criminal trial jury, was the jury able to reach a verdict?
7. Are you or is anyone close to you involved in any action currently pending in court? If yes, please explain (where and what kind of case).
8. Not counting traffic violations, have you ever been arrested, charged with a crime, convicted of a crime, or been the subject of a criminal investigation? If yes, please provide the name of the crime(s) and the approximate date(s) of the conviction, and details (when, where, what, and outcome).
9. Have you ever testified as a witness at any kind of legal proceeding, including a trial? If yes, please explain.
10. Not counting traffic violations has any immediate member of your family or someone close to you ever been arrested or charged with a criminal offense?
11. If you answered "yes" to the question above (No. 10), please give:
 - a. Person's relationship to you:
 - b. Offense with which person was charged:
 - c. Year when arrest or charge was made:
 - d. Outcome of arrest or charge:
12. Have you or has anyone close to you ever been the victim of a crime?

13. Have you, your employers, or has anyone close to you ever contacted or been contacted by any federal law enforcement agency, including the FBI? If yes, please explain.
14. Do you have any personal, political, moral, or religious opinions or beliefs regarding the issue of reproductive health care? If yes, please explain.
15. If so, do you think that you might decide this case based upon any personal feelings you might have on the issue of reproductive health care rather than the facts and law presented at trial of this matter? If yes, please explain.
16. Is there anything about your experiences or the experiences of your friends or family that would cause you to feel discomfort in listening to the facts presented in this case? If yes, please explain.
17. Do you belong to any group or organization that has taken a position on any aspect of the issue of reproductive health care? If yes, what group or organization, and explain position.
18. If you answered yes to the question above (No. 17), would your membership in such an organization pose difficulties for you in deciding this case based on the facts and law presented during the trial?
19. Have you made any contributions to any group or organization that has taken a position on any aspect of the issue of reproductive health care, even if you are not a member? If yes, please explain.
20. If you answered yes to the question above (No. 19), would your contribution to such an organization pose difficulties for you in deciding this case based on the facts and law presented during the trial?
21. Have you, your family members or close friends, ever participated in any protest, march, or rally regarding reproductive health care on either side of the issue? If yes, please explain.
22. Is there anything about that participation that would pose difficulties for you in deciding this case based on the facts and law presented during trial? If yes, please explain.
23. If you answered no to the question above (No. 22), have you ever observed any reproductive health care protests, marches, or rallies on either side of the issue?
24. Is there anything about that observation that would pose difficulties for you in deciding this case based on the facts and law presented during the trial?
25. What religious or other beliefs do you hold, if any, that would inhibit your ability or make it difficult for you to sit in judgement or to render a verdict?

26. Do you have any strong feelings – whether positive or negative – about the Planned Parenthood organization generally, or about the Planned Parenthood’s Elizabeth Blackwell Health Center located at 1144 Locust Street, in Philadelphia? If yes, please explain.
27. How would you describe your attitudes towards and perspective of work by the FBI and the U.S. Department of Justice?
- a. Positive
 - b. Negative
 - c. Neutral
28. Do you have any strong feelings for or against the FBI or the U.S. Department of Justice? If yes, please explain.
29. Do you believe that criminal investigations by the FBI and/or prosecutions by the U.S. Department of Justice are pursued for reasons other than the pursuit of justice?
30. There have been numerous criminal incidents throughout the country that have targeted reproductive health care clinics and pro-life pregnancy centers.
- a. Have you seen any of the media reports on any of these other incidents?
 - b. Which incidents?
 - c. Have you formed any impressions regarding those incidents?
 - d. Do you think you can set aside those impressions and review the facts in this case on their own without reference to those other incidents?
31. Have you heard about a case involving an assault of a Philadelphia Planned Parenthood staff member by a man named Mark Houck?
32. What if anything, did you learn from your news sources, including television, social media, the internet, and newspaper, about this case or Mark Houck?
33. Do you or anyone close to you know Mark Houck, anyone in his family, or anyone affiliated with Mark Houck?
34. Have you ever visited a website that referenced or discussed anything about Mark Houck?
35. If you have read or heard about Mark Houck or this case, have you formed an opinion about his guilt or innocence from what you have read or heard?
36. Will you be able to put any strongly held religious or political beliefs, or beliefs about reproductive health care aside and follow the Court’s instructions to apply the law to the facts presented at trial? If no, please explain.

37. Will you be able to reach a verdict of guilty or not guilty in a case involving a defendant who allegedly assaulted a victim because he was a provider of reproductive health services care?
38. Do you have any knowledge or opinions that would prevent you from basing a verdict on the evidence or that would interfere with your ability to be fair?
39. Do you have any personal, moral, or religious beliefs or opinions that would prevent you from following the law as it is explained to you at the end of the case, if the case involved a person's legal right to provide reproductive health services, and render a verdict or to sign the verdict form?

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's proposed voir dire questions has been filed and served upon all parties listed on the Electronic Case Filing (ECF) System and is available for viewing and downloading from the ECF system.

/s/ Sanjay Patel

SANJAY H. PATEL

Trial Attorney

Criminal Section, Civil Rights Division

U.S. Department of Justice